

KELLER ROHRBACK L.L.P.

AURIE B. ASHTON ①⑤⑧
AN S. BIRK
AMES A. BLOOM ①②
STEPHEN R. BOATWRIGHT ①②
AREN E. BONX
RETTCHEN FREEMAN CAPPIO
LISON CHASE ②④⑥
DAVID COPLLEY ③
LICIA M. CORBIETT ①⑧
OB J. CRICHTON ②
ANIEL A. DECHESARO ①⑧
AUREEN M. FALLECKI
ULI FARRIS ④
AYMOND J. FARROW
RIC J. FIERRO ①②
LISON S. GAPPENY
DEN P. GARRISON ⑥
AURA R. GERBER
MATTHEW M. GEREND
ARY A. GOTTO ①②

BENJAMIN GOULD ④
CHRISTOPHER GRAVER ①②
MEREDITH L. GRAY ②
GARY D. GREENWALD ①④⑧
MARK A. GRIFFIN ③
AMY N.L. HANSON
IRENE M. HECITT
SCOTT C. HENDERSON
MICHAEL G. HOWARD
KHESRAW KARMAND ②④
DEAN N. KAWAMOTO ④⑥
RON KILGARD ①②⑥⑧
KATHRYN M. KNUDSEN
DAVID J. KO
ERIC R. LABIBERTE
BENJAMIN J. LANTZ
LUKE M. LARIVIERE
CARI CAMPEN LAUFENBERG
ELIZABETH A. LELAND
MICHAEL M. LICATA

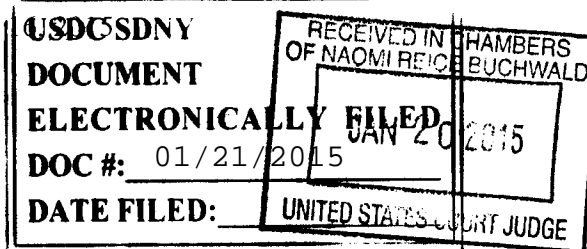
TANA LIN ⑦⑨⑥
DEREK W. LOESER
HOLLY E. LYNCH
RYAN McDEVITT
DANIEL MENSHER ③
IAN J. MENSHER
GRETCHEN S. OBRIST
ROBERT S. OVER
DAVID S. PREMINGER ①③
MATTHEW J. PREUSCH ②③⑥
ERIN M. RILEY
ISAAC RUIZ
DAVID J. RUSSELL
MARK D. SAMSON ④⑥⑧
LYNN LINCOLN SARKO ⑥⑦
WILLIAM C. SMART
THOMAS A. STERKEN
BETH M. STROSKY
KARIN B. SWOPE
PAUL A. TONELLA

HAVILA C. UNREIN ④⑩
MARGARET E. WETHERALD ⑤
AMY WILLIAMS-DERRY
MICHAEL WOERNER
BENSON D. WONG
DIANA M. ZOTTMAN ③

① ADMITTED IN ARIZONA
② ADMITTED IN CALIFORNIA
③ ALSO ADMITTED IN ARIZONA
④ ALSO ADMITTED IN CALIFORNIA
⑤ ALSO ADMITTED IN COLORADO
⑥ ALSO ADMITTED IN IDAHO
⑦ ALSO ADMITTED IN ILLINOIS
⑧ ALSO ADMITTED IN MARYLAND
⑨ ALSO ADMITTED IN MICHIGAN
⑩ ALSO ADMITTED IN MONTANA
⑪ ADMITTED IN NEW YORK
⑫ ALSO ADMITTED IN NEW YORK
⑬ ALSO ADMITTED IN OREGON
⑭ ALSO ADMITTED IN OHIO
⑮ ALSO ADMITTED IN TEXAS
⑯ ALSO ADMITTED IN WASHINGTON, D.C.
⑰ ALSO ADMITTED IN WISCONSIN
⑱ NOT ADMITTED IN WASHINGTON

January

Honorable Naomi Reice Buchwald
United States District Court Judge
USDC for the Southern District of New York
500 Pearl Street, Room 2270
New York, NY 10007



Re: *In re LIBOR-Based Financial Instruments Antitrust Litigation*, No. 11-md-2262
& *Triaxx Prime CDO 2006-1 Ltd., et al. v. Bank of America Corp., et al.*, No. 14-cv-146

VIA ECF & HAND DELIVERY

Dear Judge Buchwald:

I write to request that the case captioned *Triaxx Prime CDO 2006-1 Ltd., et al. v. Bank of America, Corp et al.*, No. 14-cv-146 (the "*Triaxx Action*") be formally included in the pending multi-district litigation proceeding *In re LIBOR-Based Financial Instruments Antitrust Litigation*, MDL No. 2262 ("*LIBOR MDL*").

In early January 2014, after the *Triaxx Action* was removed to federal court, Defendants filed a Related Case Statement (Docket No. 2) indicating that this case was related to the *City of Baltimore Action* (No. 11-cv-5450) and should be included in the LIBOR MDL. The case was accepted as related to the *City of Baltimore Action* and was assigned to Your Honor.

We now understand from the Clerk's office that the *City of Baltimore Action* has actually not been formally included in the LIBOR MDL, and hence the *Triaxx Action* is not part of the LIBOR MDL. As indicated by the Related Case Statement, the *Triaxx Action* raises similar issues to those raised by the other Direct Action Plaintiffs in the LIBOR MDL. The *Triaxx Action* is subject to some of the omnibus motions to dismiss filed by Defendants in the LIBOR MDL, and Triaxx has joined the omnibus opposition briefs filed by Direct Action Plaintiffs.

Naomi Reice Buchwald

January 16, 2015

Page 2

KELLER ROHRBACK L.L.P.

MEMO ENDORSEMENT

In light of this, we respectfully request that Your Honor issue an order directing that the *Triaxx* Action be marked as related to the LIBOR MDL, and directing the Clerk of Court to make such docket entries as are appropriate to create an association between the *Triaxx* Action and 1:11-md-02262-NRB. We have consulted with Defendants in the *Triaxx* Action and they support this request.

Sincerely yours,

s/ David S. Preminger

David S. Preminger

Counsel for the Triaxx Plaintiffs

So Ordered
Ham.
Reice
Buchwald,
USDS
1/21/15

DSP:dk